



**U.S. Department of Justice**

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District of Delaware*

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June 30, 2006

Honorable Joseph J. Farnan  
United States District Court  
844 North King Street  
Wilmington, DE 19801

RE: U.S. v. Ernest Wilson  
Cr.A.No. 05-105

Dear Judge Farnan:

The parties have been successful in narrowing the issues for trial. We have submitted joint voir dire and joint jury instructions. At this point we have no disagreement on either topic. In addition, we have agreed to a trial stipulation, a copy of which I enclose. In the stipulation, the parties agree to the admission of the exhibits listed therein, most of which are documents. The government proposes, subject to the Court's approval, the following process for the introduction and use of the documentary exhibits. At the opening of the government's case, the government will read the enclosed trial stipulation to the jury. The government will then move the admission of the documentary exhibits listed in the trial stipulation. The government will then distribute to the jury notebooks containing the documentary exhibits the Court has admitted into evidence. The defense does not object to this proposal. The government respectfully requests the Court's approval of this process.

Thank you for your consideration.

Respectfully,

COLM F. CONNOLLY  
United States Attorney

By: \_\_\_\_\_

A handwritten signature in black ink, appearing to read "David L. Hall", written over a horizontal line.

David L. Hall  
Assistant United States Attorney

DLH/jb

Enc.

cc: Michael J. Malloy, Esq. (w/encl)

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF DELAWARE**

**UNITED STATES OF AMERICA**

**v.**

**ERNEST WILSON,**

**Defendant**

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:

**Criminal Action No. 05-105-JJF**

**TRIAL STIPULATION**

The United States of America, by and through its attorneys, Colm F. Connolly, United States Attorney for the District of Delaware, and David L. Hall, Assistant United States Attorney for the District of Delaware, the Defendant Ernest Wilson, and Michael J. Malloy, Esq., Defendant's attorney, hereby stipulate and agree as follows:

1. During the period of the indictment (December 22, 2004 to July 30, 2005), defendant Ernest Wilson was an employee of the United States Postal Service engaged in the delivery of mail.

2. The following exhibits have been maintained in a proper chain of custody until introduction into evidence at trial:

Exhibit 1.....Four \$5.00 Liberty gold coins

Exhibit 2.....Two \$10.00 Liberty gold coins

Exhibit 3.....One 1909 O \$5.00 Indian-head gold coin, serial no. 1668666-001

Exhibit 3A.....Photograph of one 1909 O \$5.00 Indian-head gold coin, serial no. 1668666-001

Exhibit 4.....Photograph of one 1907 \$10.00 Indian-head gold coin, serial no. 1937676002

3. The following coins have an aggregate value of more than \$5,000.00:

Four \$5.00 Liberty gold coins

Two \$10.00 Liberty gold coins

One 1909 O \$5.00 Indian-head gold coin, serial no. 1668666-001

One 1907 \$10.00 Indian-head gold coin, serial no. 1937676002

4. On or about December 22, 2004, the following items were placed in the mail by Dillon Gage, Inc., 15301 Dallas Pkwy, #200, Addison, TX 75001 to be delivered by a person employed by the United States Postal Service to Rare Coin Alliance, Ltd., 3601 North Market Street, Suite C, Wilmington, Delaware 19802:

Exhibit 1.....Four \$5.00 Liberty gold coins

Exhibit 2.....Two \$10.00 Liberty gold coins

One additional \$10.00 Liberty gold coin

5. On or about January 31, 2005, the following item was placed in the mail by Breck Rare Coins, P. O. Box 130742, The Woodlands, TX 77393 to be delivered by a person employed by the United States Postal Service to Robert Higgins, Rare Coin Alliance, Ltd., 3601 North Market Street, Suite C, Wilmington, Delaware 19802:

Exhibit 3.....One 1909 O \$5.00 Indian-head gold coin, serial no. 1668666-001

6. On or about July 8, 2005, the following item was placed in the mail by Rare Coin Wholesalers, 34270 PCH #F, Dana Point, CA 92629 to be delivered by a person employed by the United States Postal Service to Bob Higgins, Certified Asset Management, Inc., 3601 North Market Street, Suite C, Wilmington, Delaware 19802:

One 1907 \$10.00 Indian-head gold coin, serial no. 1937676002 (depicted in Exhibit 4).

7. The following exhibits have been maintained in a proper chain of custody until their introduction into evidence in the trial, are records of regularly conducted activity within the meaning of Federal Rule of Evidence 803(6), and are admissible into evidence at trial:

Exhibit 5.....U. S. Postal Service Domestic Claim (1/26/05)

- Exhibit 6.....U. S. Postal Service Receipt for Registered Mail (1/31/05)
- Exhibit 7.....U. S. Postal Service Registered Mail Dispatch Bill (2/4/05)
- Exhibit 8.....U. S. Postal Service Accountable Mail Matter Received for Delivery (2/05)
- Exhibit 9.....U. S. Postal Service Domestic Claim (2/22/05)
- Exhibit 10.....U. S. Postal Service Receipt for Registered Mail (7/8/05)
- Exhibit 11.....U. S. Postal Service Registered Mail Dispatch Bill (7/11/05)
- Exhibit 12.....U. S. Postal Service Accountable Mail Matter Received for Delivery (7/05)
- Exhibit 13.....U. S. Postal Service Firm Delivery Receipt FTI (7/11/05) (8 articles)
- Exhibit 14.....U. S. Postal Service Firm Delivery Receipt FTI (7/11/05) (7 articles)
- Exhibit 15.....U. S. Postal Service Domestic Claim (7/29/05)
- Exhibit 16.....Dillon Gage, Inc. Invoice for 4 \$5 Liberty and 3 \$10 Liberty gold coins  
for \$4,960
- Exhibit 17.....Dillon Gage, Inc. Sales Record for 4 \$5 Liberty and 3 \$10 Liberty gold coins
- Exhibit 18.....Breck Rare Coin Co. Invoice for \$5 Indian 1909-O (1668666-001)
- Exhibit 19.....Certified Assets Management, Inc. Purchase Order for 1907 Rolled Edge \$10 gold  
coin for \$275,000
- Exhibit 20.....Certified Assets Management, Inc. Record for 1907 Rolled Edge \$10 gold  
coin for \$275,000
- Exhibit 21.....Diamond State Coins & Currency Receipt dated 5/25/05 for five gold coins (3  
maple, 2 rands) for \$2,005
- Exhibit 22.....Diamond State Coins & Currency Receipt for one 1907 St. Gaudens gold coin and  
one 1909 O Indian head gold coin dated 7/29/05 for \$4,750
- Exhibit 23.....Diamond State Coins & Currency Check #2994 dated 7/29/05 payable to Ernest

Wilson for \$4,750

Exhibit 24.....Handwritten Notes (7/30/05)

Exhibit 25.....Diamond State Coins & Currency Receipt dated 7/30/05 for one 1887 \$5 gold coin,  
one 1895 \$5 gold coin, two 1896 \$5 gold coins, and two 1899 \$10 gold coins for  
\$3,100

Exhibit 26.....Diamond State Coins & Currency Check #2995 dated 7/30/05 payable to Ernest  
Wilson for \$3,100

Exhibit 27.....July 30, 2005 Pennsylvania State Police Investigation Interview Record

Exhibit 28.....Pennsylvania State Police Property Record (10 items)

Exhibit 29.....Pennsylvania State Police Property Record (2 items)

Exhibit 30.....U. S. Postal Service Accountable Mail Matter Received for Delivery (Blank)

Exhibit 31.....Pennsylvania State Police Waiver of Rights and Consent to Search (Shore)

Exhibit 32.....Pennsylvania State Police Waiver of Rights and Consent to Search (Wilson)

Exhibit 33.....Pennsylvania State Police Rights Warning and Waiver (Wilson)

Respectfully submitted,

Colm F. Connolly  
United States Attorney

\_\_\_\_\_  
Michael J. Malloy, Esquire  
Attorney for Defendant

By: \_\_\_\_\_  
David L. Hall  
Assistant U.S. Attorney

\_\_\_\_\_  
Ernest Wilson  
Defendant